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May 1, 2025

Via ECF

The Honorable Laura Taylor Swain
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10038

Re: *Nunez v. City of New York*, 11 Civ. 5845 (LTS)

Your Honor:

Pursuant to the Court's Order, Dkt. 841, counsel for the Plaintiff Class and the United States request leave to file a letter in response to Defendants' submission from Gary Raney in support of their Compliance Director Proposal. Dkt. 842. We intend to file the response on or before May 6, 2025. Mr. Raney's declaration concerns the Department's continuing failures to abide by this Court's Orders and purports to support Defendants' Compliance Director Proposal based entirely on a short, two-week visit to Rikers, review of unspecified documents, and interviews with unspecified DOC staff and leadership. Plaintiffs request leave to respond to Mr. Raney's assertions and to address the extent to which they should be considered by the Court in deciding the pending application for the appointment of a receiver.

We thank the Court for its consideration of this matter.

Respectfully submitted,

THE LEGAL AID SOCIETY

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